

## Inspection Report

Company Name and Location: Dr. Leonard's Healthcare Corp.  
100 Nixon Lane  
Edison, NJ 08857

Responsible Officials: Vilma Hampton  
Imports Manager  
Tel: 732-225-0100 ext. 242  
email: VHampton@drleonards.com

Date of Inspection: January 31, 2018

EPA Inspectors: Stephanie Tougas (lead inspector)  
Michael Brannick

### Objectives:

To investigate potential Federal Insecticide, Fungicide, and Rodenticide Act violation of Section 12(a)(1)(F), for sale of misbranded devices.

### Inspection Summary:

On January 5, 2018, the pesticides team received an import entry in ACE for a pesticide device called Bell and Howell Ultrasonic Pest Repeller. The photograph of the device submitted into ACE was not enough for us to determine if all the labeling requirements for pesticide devices were met, so EPA inspectors decided to inspect the device, which had already been released to the importer, Dr. Leonard's Healthcare Corp. (Dr. Leonard's).

On January 25, 2018, inspectors Stephanie Tougas and Michael Brannick went to Dr. Leonard's, 100 Nixon Lane, Edison, NJ, at 10:00 am to conduct an unannounced inspection. We were met by Marilyn Reid, the Quality Control Manager for Dr. Leonard's. We presented our credentials and explained our purpose for the inspection. We requested to inspect the imported product, as well as any other pesticide products they sold. Ms. Reid then explained to us that because they are an online retailer, they sell thousands of products and that it would take a long time to locate each item we asked to inspect. We agreed to reschedule the inspection for the following week once we sent her a list of each product we intended to inspect so she could have them ready for us. We returned to the office and I emailed her a list of each product we wanted to inspect. The inspection was rescheduled for January 31, 2018.

On January 31, 2018, inspectors Stephanie Tougas and Michael Brannick returned to Dr. Leonard's to conduct the inspection at 10:30 AM. We were met this time by Vilma Hampton, the imports manager for Dr. Leonard's. We presented our credentials and issued a Notice of Inspection. Ms. Hampton lead us through the warehouse to where the products we had requested were pulled and on a pallet for us to inspect. Table 1 lists all the products we inspected.

**Table 1.** List of pesticide products sold by Dr. Leonard's that were inspected, along with establishment number (if present/ if known) and any potential deficiencies we observed.

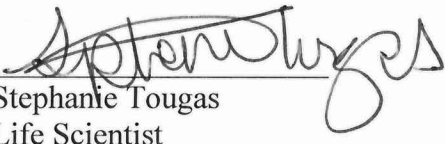
Product Name	Item Number	Est. No.	Observed potential deficiencies
Raid Fruit Fly Trap	90150	09132-CHN-001	No Est. No. anywhere on the packaging, only on the box in which the products were imported; unclear if product is device or 25(b).
ZappLight	89573	92299-CHN-001	None
Rodent Sheriff Pest Control Spray	81977	N/A	None
Riddex Pest Guard	84657	74571-FL-001	Est. No. present on item, and is visible through a plastic outer layer, but no Est. No. present on white box in which it is shipped to customer.
Solar Bug Zapper	84087	89271-CHN-001	None
Sting Shield Bracelet	84831	N/A	None
Squirrel Repelling Sachets	45204	N/A	Ingredients might not be 25(b) exempt; ingredients not separated into Active and Inert categories
Solar Animal Repeller	12931	Present, did not write down Est. No. in field/inspection photo too blurry to read the Est. No.	None
Solar Mole Repeller	80063	None present	Missing Est. No.; sticker that says "EPA 92980"-unclear what this sticker is indicating
Ninja 2 in 1 Plug in LED night light and Bug Zapper	87817	None present	No visible Est. No. anywhere on packaging or box in which product was imported – requested product to be removed from website
Riddex Sonic Plus Pest Repeller	46650	90791-CHN-001	Est. No. present on item, but is not visible through the packaging, which is a Styrofoam box.
Bell and Howel Ultrasonic Pest Repellers	80683	81956-CHN-001	None.

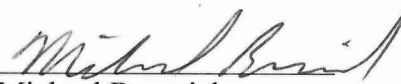
As described in Table 1, we observed potential violations for Raid Fruit Fly Trap, Squirrel Repelling Sachets, Riddex Sonic Plus Pest Repeller, Ninja 2 in 1 Plug in LED Night Light and Bug Zapper, Mole Repeller, and Riddex Pest Guard. We requested that Ms. Hampton remove the Ninja 2 in 1 Plug in LED Night Light and Bug Zapper from the online store since there was no visible establishment number anywhere on the packaging. We informed Ms. Hampton of our concerns for the other products, but did not request that Ms. Hampton take action on any of the other products until we returned to the office to review our notes and make a determination.

Ms. Hampton explained to us that because Dr. Leonard's is an online retailer, customers see product descriptions and photographs on their website or in their catalog. She gave us an example physical catalog, for which I issued a Receipt for Sample.

After we finished inspecting each product, we thanked Ms. Hampton for her time and told her that we would be in touch as soon as we reviewed the products in the office and made determinations. We concluded the inspection at 11:30 AM.

Signature of EPA inspectors

  
Stephanie Tougas  
Life Scientist

  
Michael Brannick  
Life Scientist

Attachments:

- A. FIFRA Notice of Inspection
- B. FIFRA Receipt for Samples
- C. Samples F18588-13118-1 Sub A
- D. ACE Entry for Bell and Howell Ultrasonic Pest Repeller
- E. Notes from inspection with Vilma Hampton business card
- F. Photolog

